

1 RRENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
PAUL RIDDLE  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax  
paul\_riddle@fd.org  
6 Attorney for JONATHAN OSHA BELL  
7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,  
13 v.  
14 JONATHAN OSHA BELL,  
15 Defendant.

Case No. 2:03-cr-278-LDG-PAL-1

**STIPULATION TO CONTINUE  
REVOCATION HEARING**  
(Third Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre,  
17 Acting United States Attorney, and Alexandra Michael, Assistant United States Attorney,  
18 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
19 and Paul Riddle Assistant Federal Public Defender, counsel for Jonathan Osha Bell that the  
20 Revocation Hearing currently scheduled on Thursday, September 7, 2017 at 10:00 a.m., be  
21 vacated and continued to a date and time convenient to the Court, but no earlier than sixty (60)  
22 days.

23 This Stipulation is entered into for the following reasons:

24 1. Since the filing of the previous stipulation, undersigned defense counsel has  
25 been informed that the underlying criminal allegation remains pending in a state court  
26 proceeding which is not expected to resolve before the middle of October.

1           2.       Since the state proceeding is inexorably linked to the allegations contained in  
2 the petition, the parties agree to the need for continuance.

3           3.       Defendant is not incarcerated and does not object to a continuance.

4           4.       Additionally, denial of this request for continuance could result in a  
5 miscarriage of justice.

6           This is the third request for continuance filed herein.

7           DATED this 30<sup>th</sup> day of August, 2017.

8  
9           RENE L. VALLADARES  
10 Federal Public Defender

STEVEN W. MYHRE  
Acting United States Attorney

11           */s/ Paul Riddle*  
12 By \_\_\_\_\_

13 PAUL RIDDLE  
Assistant Federal Public Defender

*/s/ Alexandra Michael*  
By \_\_\_\_\_

ALEXANDRA MICHAEL  
Assistant United States Attorney

1  
2  
3  
4 **UNITED STATES DISTRICT COURT**  
5 **DISTRICT OF NEVADA**

6 UNITED STATES OF AMERICA,

7 Plaintiff,

8 v.

9 JONATHAN OSHA BELL,

10 Defendant.  
11

Case No. 2:03-cr-278-LDG-PAL-1

**ORDER**

12  
13 Based on the Stipulation of counsel and good cause appearing,

14 IT IS THEREFORE ORDERED that the Revocation Hearing currently scheduled on  
15 Thursday, September 7, 2017 at 10:00 a.m., be vacated and continued to November 6, 2017  
16 at the hour of 9:00 a.m.

17 DATED this 1st day of September, 2017.

18  
19   
20 UNITED STATES DISTRICT JUDGE  
21  
22  
23  
24  
25  
26